

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: CORETTA BRADFORD

) Case No. 18 B 35413
)
Debtor) Chapter 13
)
) Judge: CAROL A DOYLE

NOTICE OF MOTION

CORETTA BRADFORD
12610 S LOOMIS
CALUMET PARK, IL 60827

DAVID M SIEGEL
via Clerk's ECF noticing procedures

Please take notice that on March 12, 2019 at 10:30 am my designee or I will appear before the Honorable Judge CAROL A DOYLE at 219 South Dearborn Courtroom 742, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on February 26, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On December 24, 2018 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed .
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend plan (#2) as follows: Part 2.3 select the last box and add correct tax language, 8.1 amend pre-confirmation adequate protection payments for Capital One Auto Finance to be at least \$61 .00 and amend pre-confirmation adequate protection payments for Exeter to be at least \$131 .00.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

Respectfully submitted,

/s/ Tom Vaughn